

Gordon S. Woodward, Esquire (Va. Bar No. 42449)
Schnader Harrison Segal & Lewis, LLP
750 9th Street, N.W.
Washington, D.C. 20006
Phone: 202-419-4215
Facsimile: 202-419-3454

Attorneys for Commerce Technologies, Inc.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-35653-KRH
Jointly Administered
Judge Kevin R. Huennekens

**MOTION FOR ADMISSION
PRO HAC VICE OF MICHAEL J. BARRIE**

Gordon S. Woodward ("Movant") hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(e), to enter an order authorizing Michael J. Barrie, an attorney with the law firm of Schnader Harrison Segal & Lewis LLP, to appear *pro hac vice* in the above-captioned bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Case") to represent Commerce Technologies, Inc., and in support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bars of Virginia, Minnesota, the District of Columbia and Maryland, and admitted to practice before this Court, the United States District Courts for Maryland, the District of Columbia and the Eastern and Western Districts of Virginia, the District of Columbia Court of Appeals, the Court of Appeals of Maryland, the Supreme Court of Virginia, and the Supreme Court of Minnesota.

2. Mr. Barrie is a member in good standing of the State Bars of Pennsylvania, New Jersey and Delaware and an attorney admitted to practice before the United States Court of Appeals for the Third Circuit, U.S. District Courts for the Eastern and Middle Districts of Pennsylvania, the District of New Jersey and the District of Delaware, and the Pennsylvania, New Jersey, and Delaware Supreme Courts. There are no disciplinary proceedings pending against Mr. Barrie in any jurisdiction in which he is admitted to practice.

3. Movant requests that this Court authorize Mr. Barrie to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of Commerce Technologies, Inc.

4. Movant shall serve as co-counsel with Mr. Barrie in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Michael J. Barrie to appear *pro hac vice* in the Bankruptcy Case in substantially the same form as Exhibit A attached hereto and grant such other and further relief as is just.

/s/ Gordon S. Woodward

Movant

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of February, 2009, a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* of Michael J. Barrie was served electronically on all persons receiving electronic notice in these cases, and via first class mail, postage prepaid, upon the following persons:

Robert B. Van Arsdale
Office of the United States Trustee
701 East Broad St., Suite 4304
Richmond, Virginia 23219
Assistant United States Trustee

Greg M. Galardi
Skadden, Arps, Slate, Meagher & Flom
One Rodney Square
P. O. Box 636
Wilmington, Delaware 19899
Counsel for the Debtors

Dion W. Hayes
Douglas M. Foley
McGuireWoods LLP
One James Center, 901 E. Cary St.
Richmond, VA 23219
Counsel for the Debtors

Lynn L. Tavenner
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, VA 23219
Counsel for the Official Committee of Unsecured Creditors

/s/ Gordon S. Woodward